

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
)	
CAROL DIPIETRO,)	
Plaintiff,)	
)	
v.)	C.A. No. 05-11074-NG
)	
PLYMOUTH COUNTY)	
SHERIFF S'DEPARTMENT,)	
Defendant.)	
)	
_____)	

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)
PROPOSED JOINT SCHEDULING MANAGEMENT PLAN**

1. Proposed by Plaintiff and Defendant:

Automatic Document Disclosure under Local Rule 26.2(A) shall be made by exchange of pertinent documents no later than October 1, 2005.

2. Proposed by Plaintiff and Defendant:

The parties will serve their written discovery requests, exclusive of Requests for Admissions, on or before December 31, 2005.

3. Proposed by Plaintiff and Defendant:

The parties will complete all depositions of fact witnesses, including Rule 30(b)(6) witnesses, by February 28, 2006.

4. Proposed by Plaintiff and Defendant:

Dispositive motions shall be filed by March 31, 2006. Oppositions to Summary Judgment Motions will be due four (4) weeks after the Motion is filed. Reply Briefs will be due two (2) weeks thereafter.

5. Proposed by Plaintiff and Defendant:

The Plaintiff will provide disclosure of non-damages experts in accordance with Fed.R.Civ.P 26(a)(2) by April 14, 2006. The Defendant will provide disclosure of non-damages experts in accordance with Fed.R.Civ.P 26(a)(2) by April 30, 2006. Rebuttal experts, if any, will be disclosed in accordance with Fed.R.Civ.P. 26(a)(2) by May 15, 2006.

6. Proposed by Plaintiff and Defendant:

The parties propose that a trial by jury be scheduled for June 1, 2006.

7. Proposed by Plaintiff and Defendant:

The parties do not consent at the present time to trial before a Magistrate Judge.

Respectfully submitted,

THE PLAINTIFF

By her attorney,

s/Daniel W. Rice

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THE DEFENDANT

By its attorney,

/s/Isabel N. Eonas

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Dated: August 25, 2005